

CONTINUATION OF COMPLAINT

I, TFO Matt S. Warzywak, being duly sworn, hereby depose and state as follows:

Introduction and Background

1. I am a Task Force Officer with the Drug Enforcement Administration (“DEA”), a position I have held since September of 2019. I am also a Detective/Sergeant with the Michigan State Police (MSP) and have been employed with the MSP since 2004. I am currently assigned to a multi-jurisdictional drug task force known as the Tri-County Metro Narcotics Team (TCM), which is part of the First District of the MSP.

2. This continuation is submitted for the purpose of obtaining an arrest warrant for KEVIN DUNSON for possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and cocaine, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii), 841(b)(1)(C) and being a felon in possession of firearms, in violation of 18 U.S.C. § 922(g)(1).

3. This application is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The information set forth herein is based upon my personal knowledge derived from my participation in this investigation and upon information received from other law enforcement officers and credible and reliable sources of information.

Probable Cause

4. This continuation is based on a Michigan State Police, Tri-County Metro Narcotics Team (TCM) investigation into the drug trafficking activities of KEVIN DUNSON.

5. In June of 2024, Tri-County Metro Narcotics (TCM) investigators initiated an investigation into the drug trafficking operations (DTO) of KEVIN DUNSON. Through interviews, surveillance, administrative subpoenas and trash pulls, TCM detectives have learned that KEVIN DUNSON employs two “runners” that are under his direction to deliver narcotics. The runners are members of his DTO. Investigators know they go by the alias “Lo” and “Chauncey”. TCM investigators, via comparison to Michigan Driver’s License photographs, have identified “Lo” as SUBJECT A and “Chauncey” as SUBJECT B.

6. On June 1, 2024, TCM was provided information from a source of information (SOI), regarding a narcotics dealer in the Lansing area. The SOI described the dealer as a black male that goes by “D” who sells both heroin and methamphetamine. SOI stated that “D” has someone that works for him named Chauncey and will deliver narcotics to people. SOI stated that “D” or Chauncey will drive a black Infinity bearing Michigan registration 96AAG9 to deliver narcotics. SOI stated that they have also seen “D” in a red vehicle. SOI stated that they have observed the black Infinity drop off an ounce of methamphetamine to 2817 W Willow St Lansing, Michigan.

7. On June 12, 2024, investigators interviewed confidential source CS #

121120268¹ (CS), who stated they knew of an individual that goes by “D” who sells narcotics in the area. CS described “D” as a black male who drives a black SUV. CS stated that “D” has two individuals deliver for him named “Chauncey” and “Lo”. The CS stated they have seen “D” several times a week deliver and sell narcotics in the parking lot of Mid-Michigan Recovery Services, 913 Holmes Rd. Lansing, Michigan.

8. Investigators conducted a check of 96AAG9 within Michigan Secretary of State records in June of 2024 Secretary of State indexes indicated the plate was associated with a 2013 black Infinity (VIN JN8AZ2NE9D9060617) which was registered to KEVIN DUNSON.

9. Investigators, while on surveillance, had observed this vehicle in the Greater Lansing, Michigan area. Due to the numerous sightings and the ongoing investigation, TCM detectives conducted several subsequent checks of the Michigan Secretary of State’s database in reference to the vehicle. Michigan Secretary of State records indicated the vehicle was transferred to Tiffany Yvette Hudson at the residence 18565 Forest Avenue, Eastpoint, Michigan. At that time, the vehicle was issued a new Michigan registration of 25ACM2.

10. On July 16, 2024, TCM detectives conducted surveillance on 925 Westmoreland Avenue, Lansing, Michigan. A red Mazda, matching the description

¹ The confidential source is currently working for monetary consideration in 2024. The CS has proven credible and reliable in the past by providing information that has led to several successful controlled purchases and provided accurate information that was verified independently. The CS has a criminal history that includes state arrests for controlled substances in August of 2022, January of 2023 and March of 2023.

of an associated vehicle previously provided by the SOI, was observed at the residence. The Mazda departed the residence and was driven to the ABC Liquor Store located at 4037 West Saginaw Highway, Lansing, Michigan. Investigators established surveillance of the vehicle as it left the residence. During surveillance, investigators observed the driver meet up with another vehicle in the lot for approximately four minutes. Based on prior training and experience, this is behavior indicative of a hand-to-hand drug transaction. Investigators maintained surveillance of the vehicle, as the red Mazda departed the ABC Liquor Store and drove directly to Prime Storage located at 1530 Lake Lansing Rd. Lansing, Michigan. Prime Storage is a self-storage facility surrounded by fencing and has interior and exterior units. The facility provides its customers 24-hour access that is restricted by keypad/password entry. Investigators observed the Mazda parked in front of the storage units on the west end of the facility. TCM identified KEVIN DUNSON as the driver of the Mazda. I know through my training and experience that narcotics traffickers commonly utilize storage units to store narcotics, money, and other evidence of narcotics trafficking.

11. On July 18, 2024, TCM detectives conducted surveillance on KEVIN DUNSON. KEVIN DUNSON was observed exiting 925 Westmoreland Ave, Lansing, Michigan and entering a white Santa Fe bearing Florida registration 26BTSAG.² DUNSON was observed driving the vehicle from the residence. Investigators established mobile surveillance of the vehicle as it left the residence

² A check of Florida DMV records indicated this vehicle was a commercially rented vehicle. Further investigation determined the vehicle had been rented by KEVIN DUNSON.

and surveillance was maintained until it arrived at a residence located at 419 N. Waverly Rd, Lansing, Michigan. 419 N. Waverly Rd., Lansing, MI is a residence previously identified by TCM investigators as being frequented by narcotics users/purchasers. DUNSON parked in the driveway of the residence. A white female was observed approaching the passenger side of his vehicle. KEVIN DUNSON was at the residence for approximately three minutes. TCM investigators didn't see KEVIN DUNSON exit his vehicle. Immediately following the meeting, DUNSON departed the residence and drove directly to Rite Aid located at 3700 West Saginaw Highway, Lansing Michigan (approximately 0.3 miles away). TCM detectives observed a white male exit KEVIN DUNSON's vehicle holding something in his pocket. No occupant other than DUNSON and the white male were in the vehicle. Based on my training and experience, DUNSON's travel and brief meet-ups with various individuals is indicative of narcotics transactions.

12. On July 22, 2024, TCM detectives observed additional behavior typical of narcotics distribution while they conducted surveillance of the residence located at 925 Westmoreland Avenue, Lansing, Michigan. TCM detectives observed the aforementioned white Santa FE rented by KEVIN DUNSON being driven from the residence. TCM detectives did not identify a driver. The vehicle was observed briefly parking in a restaurant parking lot where a white female entered the front passenger seat for less than two minutes before exiting and entering into a separate vehicle. Both vehicles were observed exiting the lot and driving in different directions.

13. On August 1, 2024, TCM detectives again conducted surveillance of the residence located at 925 Westmoreland Avenue. A black male matching the description of SUBJECT A, walked from the residence and entered into the driver seat of the black Infinity bearing Michigan registration 25ACM2 parked adjacent to the residence. The Infinity was observed departing the above address and surveilled to Family Dollar where it briefly parked within the parking lot. Investigators observed a Jeep enter into the parking lot and park adjacent to the Infinity. Investigators observed a white female exiting the passenger seat of the Jeep and briefly entering into the passenger seat of the Infinity. After the female entered into the Infinity it was driven from the lot followed closely by the Jeep. Investigators observed both vehicles drive several blocks before stopping on a side street. Investigators observed the same white female exit the passenger seat of the Infinity and re-enter the passenger seat of the Jeep she initially exited. Both vehicles left in different directions immediately following the interaction. Investigators continued surveillance of the Infinity which was observed driving directly to 419 N. Waverly Avenue where a white female was observed approaching the passenger side of the vehicle. The Infinity was at that address for approximately five minutes before departing. TCM detectives, based on their training and prior experience, identified this pattern of behavior as indicative of hand-to-hand drug exchanges between a retail narcotics distributor and retail purchasers/users of narcotics.

14. On August 19, 2024, TCM detectives conducted surveillance of the residence located at 925 Westmoreland Avenue. A black male entered KEVIN

DUNSON's Santa Fe and departed the residence. Mobile surveillance of the vehicle was established as it left the residence. The Santa Fe was observed quickly meeting up with two different vehicles at multiple locations. Each meeting lasted less than three minutes. Following the meeting of one of the aforementioned vehicles, a marked police vehicle conducted a traffic stop. During the traffic stop approximately two ounces of methamphetamine and six bindles of heroin marked with the letter "Z" or "N" were located in the vehicle and the vehicles occupants were detained/arrested by Clinton County Sheriff's Office. I note that similarly packaged narcotics were subsequently located during the execution of a state search warrant at 925 Westmoreland Avenue on October 29, 2024 as part of this investigation. Investigators field-tested the substances using a Tru Narc device. The substances respectively field-tested positive for methamphetamine and heroin. Investigators interviewed the passenger and driver of the vehicle. Both individuals stated they purchased the narcotics from the white SUV and the passenger stated they purchased the narcotics from SUBJECT B (known to them as "Chauncey").

15. On September 5, 2024, TCM detectives conducted surveillance of the residence located at 925 Westmoreland Avenue. A silver Ford Edge was observed at the residence bearing South Carolina registration TZW747³ that, after checking associated indexes, was identified as registered to a commercial rental company. Investigators observed DUNSON drive the Edge and depart the residence. Mobile

³ Through further investigation TCM Detectives identified the vehicle as being rented to/by Tiffany Hudson, an associate of KEVIN DUNSON. Hudson and DUNSON share a common vehicle registered to a common address in Eastpointe, Michigan.

surveillance of the vehicle was established and investigators observed the vehicle drive to 1813 Pattengill Avenue. TCM investigators identified 1813 Pattengill as a previous residence of DUNSON. At 1813 Pattengill, investigators observed DUNSON exiting the vehicle and using a key to unlock the residence and enter it. He stayed in the residence for less than two minutes, returned to the Ford Edge, and departed. He then drove the Edge directly to a convenience store and parked within the lot. Shortly thereafter, investigators observed a white male enter KEVIN DUNSON's vehicle for less than a minute. Upon exiting KEVIN DUNSON's vehicle the subject entered into the passenger side of another vehicle that was parked nearby. Both vehicles were observed leaving the area. Based on my training and experience, these meet-ups were indicative of short-stay narcotics transactions.

16. On September 24, 2024, TCM detectives conducted surveillance of the residence located at 925 Westmoreland Avenue. Investigators observed a grey Dodge Durango bearing Georgia registrationTFZ0732 that was rented by Tiffany Hudson, leave the residence. Investigators observed the vehicle park within the parking lot of a party store. At that time investigators observed KEVIN DUNSON exit the vehicle and enter the party store. A check of the State of Georgia registration indexes indicated the vehicle was registered to a rental company. Investigators are aware, based on training and prior experience, that drug traffickers commonly utilize rental vehicles rented by third parties and frequently change vehicles to avoid law enforcement detection.

17. On October 15, 2024, TCM detectives surveilled KEVIN DUNSON

while he was at the residence located at 215 S Homer Street, Lansing, Michigan. KEVIN DUNSON was observed exiting the side door of the residence and entering into the grey Dodge Durango rental vehicle. Mobile surveillance was established and maintained as the vehicle was driven from the residence. KEVIN DUNSON was observed driving the vehicle directly to 925 Westmoreland Avenue. The vehicle was observed parking in the driveway of the residence. KEVIN DUNSON remained at the residence for several hours before he was observed exiting 925 Westmoreland Avenue and returning to the Dodge Durango rental vehicle. Mobile surveillance was established and maintained as the vehicle was driven from the residence. Investigators observed the vehicle park in front of 509 West Lenawee Street, Lansing, Michigan. TCM detectives observed a black male walk up to the vehicle and make contact with KEVIN DUNSON. The contact lasted for approximately one minute. KEVIN DUNSON departed immediately after and drove directly to 215 S. Homer Street in Lansing, Michigan.

18. On October 17, 2024, TCM detectives again surveilled KEVIN DUNSON. DUNSON was located driving the grey Dodge Durango rental vehicle on Grand River Avenue near Downer Avenue. KEVIN DUNSON was observed entering Prime Storage located at 1530 Lake Lansing Rd. Lansing, Michigan and parking on the west side of the facility. KEVIN DUNSON was observed departing the storage facility after a short period of time and driving directly to 925 Westmoreland Avenue. Investigators observed KEVIN DUNSON arrive at the residence. Shortly thereafter a black male fitting the description of SUBJECT A

was observed entering the driver's seat of a silver in color Pacifica bearing Michigan registration 11912RF. A review of rental records confirmed this vehicle was rented by DUNSON. Mobile surveillance was established and maintained as SUBJECT A drove the vehicle from the residence. Investigators watched as SUBJECT A stopped momentarily at two different residences. Each stop lasted for less than three minutes. Based on investigators' training and experience, these quick stops were indicative of narcotics trafficking.

19. Given DUNSON's contacts at 215 S. Homer Street and 925 Westmoreland Avenue and suspected involvement in narcotics trafficking, TCM detectives did trash pulls at these locations.

20. On August 5, 2024, investigators did a trash pull at 925 Westmoreland Avenue, Lansing, MI. Following the collection, the contents of the trash were transported to a secure location to be searched. The search yielded a stack of cut Michigan Lottery tickets. I know from my training and experience that cut lottery tickets are commonly used by narcotics dealers to create bindles to package heroin for retail sale. Investigators also found a vacuum sealed bag with duct tape and various sizes of plastic bags, all of which may be used to contain and transport narcotics. Detectives with TCM did a field-test of residue found on the bags, which yielded a positive result for the presence of cocaine.

21. On August 19, 2024, TCM did another trash pull at 925 Westmoreland Avenue. Following the collection, the contents of the trash was transported to a secure location to be processed and searched. The subsequent search yielded a stack

of cut Michigan Lottery Tickets, a vacuum sealed bag; and different-sized plastic bags, missing corners indicating a “tie off,” which is a common way for narcotics dealers to sell narcotics. Detectives with TCM did a field-test of residue found on the bags, which yielded a positive result for the presence of cocaine.

22. On October 28, 2024, TCM conducted another trash pull from 925 Westmoreland Avenue. Following collection, the contents of the trash were transported to a secure location to be processed and searched. The search yielded another stack of cut Michigan Lottery Tickets; different sized plastic bags, some with missing corners indicating a “tie off”, a common way for narcotics dealers to sell narcotics; a rental agreement from Enterprise Rent-A-Car listing KEVIN DUNSON as primary and SUBJECT B as an additional driver for a 2024 Hyundai Tucson bearing plate EUE6318 VIN 5NMJBCDE2RH325901 for rental term May 6, 2024 to May 24, 2024; and packaging for kilogram quantities of narcotics. Members of TCM did a field test for residue found on the plastic bags, which yielded a positive result for the presence of cocaine.

23. On October 21, 2024, TCM detectives conducted a trash pull from 215 S. Homer St. Following collection, the contents of the trash were transported to a secure location to be processed and searched. The search yielded an empty prescription bottle with Kevin DUNSON’s name and information on the label. In addition, a handwritten envelope with “KD” written on the front. “KD” are the initials for KEVIN DUNSON.

24. On October 28, 2024, TCM detective conducted a trash pull from 215 S

Homer St. Following collection, the contents of the trash were transported to a secure location to be processed and searched. The search yielded a rental agreement from Avis. The rental agreement lists Tiffany Hudson as the renter. The vehicle is a 2024 Dodge Durango bearing Georgia plate TFZ0732. It should be noted that Affiant and TCM detectives have observed KEVIN DUNSON driving this vehicle on several occasions and that the vehicle was rented by Tiffany Hudson from 9/21/24 to 10/21/24. TCM detectives also located several identifying items to include: a statement addressed to KEVIN DUNSON with P.O. Box 70083 Lansing, MI and instructions for medication prescribed to KEVIN DUNSON.

25. In furtherance of the investigation, TCM detectives conducted surveillance on Prime Storage Facility located at 1530 Lake Lansing Rd. Lansing, MI 48912 on multiple occasions. KEVIN DUNSON was observed entering the storage facility on July 16, 2024, October 14, 2024, and October 17, 2024.

26. Investigators served an administrative subpoena to Prime Storage and learned that KEVIN DUNSON accessed unit number 010 during surveillance on October 14, 2024. Records provided by the storage facility indicated the storage unit was rented by SUBJECT B. SUBJECT B is believed to be a member of KEVIN DUNSON's drug trafficking organization. Records provided by the storage facility indicated the payment for services were primarily made in cash. A record of customer access to the unit was also provided. A review of access to the unit between September 14, 2024 and October 14, 2024 showed that the unit was accessed on 9/14, 9/15, 9/16, 9/18, 9/20, 9/21, 9/22, 9/23, 9/26, 9/27, 9/28, 9/29, 10/1,

10/3, 10/4, 10/6, 10/7, 10/8, 10/10, 10/12 and twice on 10/14. Investigators believe that it is common for drug dealers to utilize a storage facility to store narcotics, money or other items they attempt to conceal from law enforcement. It is also common for drug dealers to use a different name when obtaining a storage unit to conceal their identify from law enforcement. It is also uncommon for most citizens to visit a storage unit this often in a 30-day period.

27. Based on its investigation, TCM detectives requested search warrants for 925 Westmoreland Avenue, 215 S. Homer Street, and rental unit 10 at Prime Storage located at 1530 Lake Lansing Road. On October 28, 2024, Judge Cynthia Ward of the 54a District Court in Lansing authorized search warrants for each of these locations.

28. On October 29, 2024, TCM detectives, Drug Enforcement Administration, and the Lansing Police Department START team executed the search warrants on the two residences and storage unit. Investigators located significant amounts of narcotics, U.S. Currency and a firearm at each location.

29. On October 29, 2024, investigators were at Prime Storage (1530 Lake Lansing Rd, Lansing, MI, Unit #010) when they spoke with the General Manager of Prime Storage who advised that the renter of Unit #010 had also rented Unit #011. The General Manager stated that the subject who rented Unit #010 also rented Unit #011 on September 30, 2024 but provided a different name. Where the name of the renter for Unit #010 was SUBJECT B, the name provided for Unit #011 was "Gary Wasman." During the search of 215 S Homer St in Lansing, Michigan,

investigators encountered KEVIN DUNSON within the residence and he was detained for the duration of the search. Additionally, investigators encountered Raquel Martinez within the residence who stated that she was on the lease for 215 S Homer Street. In an interview later conducted by TCM detectives with KEVIN DUNSON, he stated that his residence is at 215 S Homer Street where he has been for the past two months. Investigators located a fraudulent Michigan's Driver's license utilizing the name "Gary Jason Wasman" with a picture of KEVIN DUNSON on the driver's license. Investigators also found storage unit keys. The keys were later found to operate the locking mechanisms and allow entry to both Units #010 and #011 at the Prime Storage facility.

30. On October 29, 2024, a search warrant was drafted for Prime Storage 1530 Lake Lansing Road Rd Lansing, MI 48912, Unit #011. The search warrant was authorized by Magistrate Stefani Godsey of the 55th District Court in Mason, Michigan. The search of Unit 011 yielded approximately 2 kilograms of a substance that field-tested positive as cocaine HCL; approximately 3 kilograms of a substance that field-tested positive as methamphetamine; a Glock .45 caliber handgun; a Draco 7.62 handgun; a large quantity of miscellaneous pills; approximately 1.38 grams of a substance that field tested positive as a fentanyl compound or methamphetamine; approximately 1.65 grams of a substance that field tested positive as fentanyl; approximately 7.88 grams of a substance that field tested positive as heroin with fentanyl compound; \$468,340.00 in United States Currency; KEVIN DUNSON's Michigan Department of Corrections Discharged Prisoner

identification card; and, KEVIN DUNSON's Chase/Visa banking card. Notably, no other forms of identification were found in Unit #011. Furthermore, the key to Unit 011 was found inside 215 S. Homer Street, where law enforcement encountered DUNSON.

31. I have reviewed KEVIN DUNSON's criminal history and I note that he has the following prior felony criminal convictions.

- a. 2001 Felony Assault with Dangerous Weapon (two convictions)
- b. 2001 Felony Firearm (two convictions)
- c. 2005 Attempt- Felony Controlled Substance Del/Mfg <50 Grams
- d. 2005 Felony Firearm
- e. 2005 Felony Controlled Substance Possession <25 Grams
- f. 2009 Felony Controlled Substance Del/Mfg <50 Grams
- g. 2010 Felony Controlled Substance Del/Mfg <50 Grams (two convictions)
- h. 2015 Felony Weapons – Carrying Concealed
- i. 2015 Felony Weapons-Firearms- Possession by Felon
- j. 2022 Felony Police Officer Assaulting/Resisting/Obstructing

32. I have consulted the Bureau of Alcohol, Tobacco, Firearms, and Explosives. They have preliminarily evaluated the Glock .45 caliber handgun and Draco 7.62 handgun, and have told me that both weapons were manufactured outside the State of Michigan.

Conclusion

33. Based on the foregoing, I submit there is probable cause to believe that Kevin DUNSON has committed the offenses of possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and cocaine on or about October 29, 2024 and felon in possession of firearms, on or about October 29, 2024 and respectfully request an arrest warrant.